

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V (DRAFT) #: V-05-061

STEIN, INC.

69 ARMCO ROAD, ASHLAND, KENTUCKY 41105.

SEPTEMBER 15, 2005

SANDRA M. COOKE, REVIEWER

SOURCE I.D. #: 021-019-00107

SOURCE A.I. #: 37297

ACTIVITY #: APE20050002

SOURCE DESCRIPTION:

Stein, Inc. is a slag processing plant that supports A.K. Steel in Ashland, Kentucky. Stein, Inc. is located on property within the A. K. Steel site. Due to this, the Division and the U.S. EPA consider Stein and A.K. Steel to be one source as defined in 401 KAR 51:017, Prevention of significant deterioration of air quality (PSD). Each is responsible for their own violations unless there is a joint cause for the violations. Stein was issued a federally enforceable permit in November, 2000 with the only applicable regulation being 401 KAR 63:010, Fugitive emissions. A few changes to the plant and a change of ownership/name have occurred since that issuance.

Stein, Inc. applied for a renewal of permit F-00-020 R2 in July of 2005. Examination of available documents for Stein, Inc. show that the facility also applied for a minor revision of F-00-020 R2 in February of 2004 (log #56321) to include the addition of two Oxygen Lance Torches. Even with the addition of the Oxygen Lance cutting torch, fugitive emissions of PM is still the only emission of concern. The renewal of the Stein, Inc. permit will be issued as a new Title V permit.

COMMENTS:

The facility is subject only to 401 KAR 63:010, Fugitive emissions so the company shall take all reasonable and necessary precautions to prevent particulate matter from becoming airborne.

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations